

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF OREGON**

In re

HOLLY C ADAIR

) Case No. 319-30181-TMB13  
)  
) Confirmation hearing date: Mar 14, 2019  
) **SUPPLEMENTAL**  
) **TRUSTEE'S OBJECTION TO**  
) **CONFIRMATION AND MOTION**  
Debtor(s). ) **TO DISMISS**

Wayne Godare, the Standing Chapter 13 Trustee Objects to Confirmation of the above case for the reason(s) set out below:

- \_\_\_\_\_ a. Plan is not feasible:
- \_\_\_\_\_ b. Case/Plan is not proposed in good faith or is forbidden by law:
- \_\_\_\_\_ c. Plan does not commit all of debtor's excess projected disposable income pursuant to 11 U.S.C. §1325(b)(1)(B) for the applicable commitment period:
- \_\_\_\_\_ d. Plan does not meet the best interest test of 11 U.S.C. §1325(a)(4):
- \_\_\_\_\_ e. Filing/documentation is deficient:

  X   f. Other: **as requested at the §341(a) hearing, please make the following changes to the plan:**

- 1. ¶3(e) add "Proceeds from the sale or refinance of real property outlined in paragraph 15 and any non-exempt proceeds from the medical malpractice claim outlined on Schedule A/B";**
- 2. Add ¶17 using Trustee Suggested Language #7 for "All returns";**
- 3. The Trustee objects to confirmation until such time as it is demonstrated to the Trustee that all required outstanding tax returns have been filed with the appropriate taxing authority and copies have been provided to the Trustee.**

If by the time of the scheduled confirmation hearing, debtor fails to take all necessary steps to satisfy each objection marked above, or is not prepared to address the Trustee's objections with the filing of an amended plan as directed by the court during that scheduled confirmation hearing, the Trustee may, in his discretion, urge the court for an order dismissing the case without further notice.

I certify that on February 28, 2019, copies of the above Objection and Motion were served on the debtor(s) by first class mail and any debtor(s) attorney by ECF.

DATED: February 28, 2019

/s/ Wayne Godare, Trustee

DARIN WISEHART  
(mn)